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DOCUMENT

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**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

EASYTEX CORPORATION LIMITED,

Plaintiff,

v.

PETER & FRANK OF NY, CORP., CHUL KYU
 KIM a/k/a KIM CHUL KYU a/k/a CHUL CHUL
 KIM a/k/a ROBERT CHUL KIM a/k/a CHUL
 KYOO KIM a/k/a CHULKYOO KIM a/k/a KIM
 K. CHUL, BARO SHIPPING CO., LTD., TOP
 TEN TRANS, INC., GFA, INC., 3 WIN INC.,
 MERCURY, AMERICAN INTERNATIONAL
 LINE, INC., SOON CHAN HONG a/k/a SOON
 C. HONG a/k/a SOONCHAN C. HONG a/k/a
 SOON CHAN HONG a/k/a CHAN S. HONG
 a/k/a HONG S. CHAN a/k/a HONG SOON
 CHANG d/b/a SOONCHAN HONG CUSTOM
 HOUSE BROKER, STOP & STOR, jointly and
 severally,

Defendants.

Civil Action No. 07-CV-03907 (BSJ) (JCF)

ECF CASE

~~PROPOSED~~ JOINT DISCOVERY
 PLAN

Counsel for Plaintiff and Counter Defendant, Easytex Corporation Limited ("Plaintiff"), Counsel for Defendants and Counter Claimants, Peter & Frank of NY, Corp. ("Defendant Peter&Frank") and Chul Kyu Kim a/k/a Kim Chul Kyu a/k/a Chul Kyu Kim a/k/a Robert Chul Kim a/k/a Chul Kyoo Kim a/k/a Chulkyoo Kim a/k/a Kim K. Chul ("Defendant Kim"), Counsel for Defendants, Soon Chan Hong a/k/a Soon C. Hong a/k/a Soonchan C. Hong a/k/a Soon Chan Hong a/k/a Chan S. Hong a/k/a Hong S. Chan a/k/a Hong Soon Chang d/b/a Soonchanhong Custom House Broker ("Defendant Hong"), American International Line, Inc. ("Defendant AIL"), and Mercury ("Defendant Mercury"), and Counsel for

Defendant Stop & Stor ("Defendant Stop & Stor") (collectively, "Defendants"), having conferred in accordance with Fed. R. Civ. P. 26(f), submit the Joint Discovery Plan set forth below:

1. Initial Disclosures

The parties have agreed to exchange initial disclosures by September 21, 2007.

2. The Time to Complete Discovery

The parties estimate that fact discovery can be completed within six (6) months from the date of the initial pretrial conference subject to the Court's discretion. If the parties need an extension of the discovery period, which is allowed under the Rule, they may seek an extension with the Court.

2.1. Interrogatories and Document Request

The parties intend to exchange interrogatories and document requests during the discovery period under the applicable local rules. Answers to interrogatories and responses to document production requests are to be served within 60 days of service.

2.2. Depositions

Plaintiff notified to Defendants that it intends to depose the following individuals or representatives of corporate entities:

Defendant Kim
13 Central Avenue, Apartment 2
Allendale, New Jersey 07401

Defendant Peter & Frank
1239 Broadway, Room 810
New York, New York 10001

Defendant Hong
4709 211th Street
Bayside, New York 11361

Defendant AIL
230-59 International Airport Center Blvd.
Suite 281
Springfield Garden, New York 11413

Defendant Mercury
230-59 International Airport Center Blvd.
Suite 281
Springfield Garden, New York 11413

Defendant Kim, Defendant Peter & Frank, and Defendant Stop & Stor notified to Plaintiff that they intend to depose the representative of the following corporate entity:

Plaintiff Easytex
Flat B, 7/FL.
Tai Fung Industrial Building, No.61
Hung To Road, Kwun Tong
Kowloon, Hong Kong, China

However, this list is subject to change depending upon facts and issues raised through the course of discovery. Additionally, the parties reserve the right to conduct up to 10 depositions each without leave of the Court.

3. Expert Report

If any of the parties desire to submit an expert report, that party will identify the expert, and the expert report will be exchanged no later than two (2) months prior to the discovery end date; rebuttal reports to be exchanged within 30 days of receipt of affirmative reports; expert depositions to be completed within 30 days of receipt of rebuttal reports.

4. Potential Discovery Problems

Defendants Top Ten Trans, Inc., GFA, Inc., and 3 Win Inc. have failed to answer the Complaint to date. Plaintiff intends to file an entry of default after the initial pretrial conference, which is scheduled on September 26, 2007.

As to Defendant Baro Shipping, Co. ("Defendant Baro Shipping"), the Complaint is in the process of being served upon Defendant Baro Shipping through the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents pursuant to Fed. R. Civ. P. 3(f). As to Defendant Stop&Stor, Plaintiff agreed to an extension of time for Defendant Stop&Stor to answer or otherwise respond to the Complaint until September 21, 2007. Accordingly, Plaintiff reserves the right to conduct discovery with respect to Defendant Baro Shipping and Defendant Stop&Stor after these defendants answer or otherwise respond to the Complaint.

5. The Time to File Dispositive Motions

The parties agreed that any dispositive motions may be filed no later than 30 days after the discovery end date.

6. ~~Pretrial Conference~~

~~Pre-trial conference may be scheduled 60 days after hearing of dispositive motions. In the event that no dispositive motion is filed by any of the parties, pre-trial conference may be scheduled 60 days after the discovery end date.~~

6. The pretrial order shall be filed 30 days after the discovery end date unless any dispositive motion is filed at that time. Respectfully submitted, if a dispositive motion is filed, the pretrial order shall be filed 30 days after the motion is decided.

By: _____
Hyun Suk Choi, Esq.

**The Park Law Group, LLC
Attorneys for Plaintiff
Easytex Corporation Limited**

By: _____
Carl E. Person, Esq.

**Attorney for Defendants
Soon Chan Hong, American International
Line Inc., and Mercury**

By: _____
Daniel K. Lee, Esq.

**Attorney for Defendants
Peter & Frank of NY Corp. and
Chul Kyu Kim**

By: _____
Patrick J. Maloney, Esq.

**Attorney for Defendant
Stop & Stor**

IT IS SO ORDERED:

Dated: 9/26/07

James C. Francis IV

Honorable James C. Francis, U.S.M.J.